

1:23-cr-00093

Judge Edmond E. Chang

Magistrate Judge M. David Weisman

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAR 14 2023
FILED

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UNITED STATES OF AMERICA

v.

STEPHEN R. JENKINS,
KEITH R. MCCORMICK,
 also known as "Keith Lopez,"
DANIEL HEISE,
DONALD W. GRENIER, JR.,
JOSE HERNANDEZ, and
WILLIAM F. KOCH

No. 23 CR 93

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Violations: Title 21, United
States Code, Sections 841(a)(1)
and 846, and Title 18, United
States Code, Section 924(c).

COUNT ONE

THE SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. From no later than in or about February 2022, and continuing until on or about February 16, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEPHEN R. JENKINS,
KEITH R. MCCORMICK,
 also known as "Keith Lopez,"
DANIEL HEISE,
DONALD W. GRENIER, JR.,
JOSE HERNANDEZ, and
WILLIAM F. KOCH,

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute

and distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846; and

2. With respect to STEPHEN R. JENKINS, KEITH R. MCCORMICK, also known as “Keith Lopez,” and DANIEL HEISE, the offense involved 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance.

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about April 1, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

STEPHEN R. JENKINS,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about July 11, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL HEISE, and
WILLIAM KOCH,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 9, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DONALD W. GRENIER, JR.,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about September 20, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DONALD W. GRENIER, JR.,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about February 16, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DANIEL HEISE,

defendant herein, did knowingly possess a firearm, namely, a loaded Springfield XDm, .45 caliber firearm, bearing serial number BB153125, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, conspiracy to possess with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendant DANIEL HEISE shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).

2. In addition, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

3. The property to be forfeited includes, but is not limited to:

a. the following specific property:

i. approximately \$5,387 seized by law enforcement on February 16, 2023, from at 5145 South Neenah Avenue, Chicago, Illinois;

ii. a Springfield XDm, .45 caliber firearm, bearing serial number BB153125, and associated ammunition.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the

jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Erika L. Csicsila on behalf of the
ACTING UNITED STATES ATTORNEY